Colorado Department of Public Health and Environment

OPERATING PERMIT

Sterling Energy Company

Yenter Gas Processing Plant

Issued: September 1, 1998
Renewed: August 1, 2003

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	Yenter Gas Processing Plant	OPERATING PERMIT NUMBER
FACILITY ID:	0750029	**95OPLO105**
ISSUE DATE:	September 1, 1998	
RENEWAL DATE:	August 1, 2003	
EXPIRATION DATE:	July 31, 2008	
MODIFICATIONS:	See Appendix F of Permit	

Issued in accordance with the provisions of the Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations.

ISSUED TO:
Sterling Energy Company
1200 17th Street, Suite 1000
Denver, CO 80202

PLANT SITE LOCATION:
17598 County Road 21
Sterling, Colorado 80751
Logan County

INFORMATION RELIED UPON
Operating Permit Application Received: November 26, 2002
And Additional Information Received: December 31, 2002 & January 10, 2003

Nature of Business: Natural Gas Processing
Primary SIC: 1321

RESPONSIBLE OFFICIAL		FACILITY CONTACT PERSON	
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SUBMITTAL DEADLINES

Semi-Annual Monitoring Period:	April 1 – September 30; October 1 – March 31
Semi-Annual Monitoring Report:	November 1, 2003 & May 1, 2004 and subsequent years
Annual Compliance Period:	April 1 – March 31
Annual Compliance Certification:	May 1, 2004 and subsequent years

NOTE: The Semi-Annual Monitoring reports and the Annual Compliance report must be received at the Division office by 5:00 PM on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility is a Natural Gas Processing Plant as defined under Standard Industrial Classification code 1321. Gas is compressed by two (2) internal combustion engine driven compressor units. The gas is contacted with ethylene glycol to remove moisture before the natural gas liquids are separated from the natural gas.

The facility is located in Logan County about 9 miles northwest of Sterling, Colorado. Nebraska and Wyoming are affected states within 50 miles of the plant. There is no Federal Class I designated area within 100 kilometers of the plant.

1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.

1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Colorado Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source review requirements of Part B. Any revisions made using the provisions of Colorado Regulation No 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. This Operating Permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits formerly issued to K.N. Gas Gathering, Inc.:

89LO295-1 89LO295-2 89LO295-5 91LO133

1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:**

Section IV -	Condition 14	(Odor)
	Condition 18	(Ozone Depleting Compounds as noted)

1.5 All information gathered pursuant to the requirements of this permit is subject to the Record keeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit.

2. Alternative Operating Scenarios (NSR/PSD SOURCES)

The following Alternative Operating Scenario (AOS) for temporary engine replacement has been reviewed in accordance with the requirements of Colorado Regulation No. 3., Part A, Section IV.A, Operational Flexibility-Alternative Operating Scenarios, and Colorado Regulation No. 3, Part B, Construction Permits, and has been found to meet all applicable substantive and

procedural requirements. This permit incorporates and shall be considered a construction permit for any engine replacement performed in accordance with this AOS, and the permittee shall be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

For purposes of Colorado Regulation No. 3, Part B, Section IV.G.4.a., any engine replacement authorized under this AOS shall commence operation upon notation of same in the contemporaneous log as required below. Results of any testing required below shall be normalized for comparison to the applicable permitted emission limits.

2.1 Temporary Engine Replacement

The following AOS is incorporated into this permit in order to deal with a compressor engine breakdown or periodic routine maintenance and repair which requires the use of a temporary replacement engine. "Temporary" is defined as in the same service for 270 operating days or less in any 12 month period. The 270 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day counts towards the 270 day total. Note that the compliance demonstrations made as part of this AOS are in addition to any compliance demonstrations required by the permit.

2.1.1 The permittee may temporarily replace an existing compressor engine that is subject to the emission limits set forth in this permit with an engine that is of the same manufacturer, model, and horsepower or a different manufacturer, model, or horsepower as the existing engine without modifying this permit.

The permittee shall measure nitrogen oxide (NO_x) and carbon monoxide (CO) emissions in the exhaust from the temporary replacement engine using a portable flue gas analyzer within seven (7) calendar days of commencing operation of the temporary replacement engine. Calibration of the analyzer shall be conducted according to manufacturer's instructions.

In the absence of evidence to the contrary, results of the portable flue gas analyzer test shall be evidence of enforceable compliance or noncompliance of the temporary replacement engine with the emission limitations of the original engine.

An exceedance of either the NO_x or CO emission limitation during the initial portable flue gas analyzer test shall require a subsequent portable flue gas analyzer test indicating compliance with both the NO_x and CO emission limitations within 14 calendar days of commencing operation of the replacement engine. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

If portable flue gas analyzer results indicate compliance with both the NO_x and CO emission limitations within the 14 day period, the temporary replacement engine will be considered to be in compliance for purposes of this AOS from the time that the replacement engine commenced operation until the replacement engine is taken off line.

If portable flue gas analyzer results fail to indicate the compliance with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. In the absence of evidence to the contrary, the temporary replacement engine will be considered to be out of compliance from the time that the temporary replacement engine commenced operation until the engine is taken off line. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period.

2.1.2 The permittee may temporarily replace a grandfathered or permit exempt engine or an engine that is not subject to emission limits without modifying this permit. Potential emissions from the temporary replacement engine must be less than or equal to the potential emissions from the original grandfathered or permit exempt engine or for the engine that is not subject to emission limits, as determined by applying appropriate emission factors.

2.1.3 Temporary replacement engines, whether of the same manufacturer, model, and horsepower, or of a different manufacturer, model, or horsepower, are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit.

2.1.4 The permittee shall maintain a log on-site to contemporaneously record the start and stop date of any temporary engine replacement, the manufacturer, model number, horsepower, and serial number of the engine(s) that are temporarily replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine.

2.1.5 Results of all tests conducted pursuant to this AOS shall be kept on site for five (5) years and made available to the Division upon request.

2.1.6 For comparison with an annual or short term emissions limit, the results of any testing required by this AOS shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation, the test results shall be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

2.2 Additional Sources

Current Colorado State Air Quality Regulations do not allow for advanced New Source Review in the absence of discrete and verifiable information concerning future installations. Therefore, any additional operational changes requiring new equipment at this facility not addressed by these Alternative Operating Scenarios will need to undergo appropriate Colorado Regulation No 3 review procedures.

Table 1
Internal Combustion Engine Information for the AOS

Emission Point	Replacement Engine	Periodic Monitoring	Stack Test?
S002	Caterpillar G398TASI, 500 HP, SN 73BI453	Yes	No
S003	Waukesha 1197GU, 126 HP, SN 158559		

3. Prevention Of Significant Deterioration (PSD)

3.1 One other Operating Permit (95OPLO058) is associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

3.2 This facility is located in an area designated as attainment for all regulated pollutants. It is categorized as a major source in an attainment area (Potential to Emit > 250 Tons/Year) and is considered major for purposes of Prevention of Significant Deterioration (PSD) regulations. Future modifications at this facility resulting in a significant net emissions increase (see Colorado Regulation No. 3, Part A, Section I.B.37 and 58) for any pollutant as listed in Colorado Regulation No. 3, Part A, Section I.B.58 or a modification which is major by itself will result in the application of the PSD review requirements.

4. Accidental Release Prevention Program (112(r))

4.1 Based on the information provided by the applicant, this facility is subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Summary of Emission Units

5.1 The emissions units regulated by this permit are the following:

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device	Construction Permit
E166	002	E166	Caterpillar G398TASI, 4 Cycle Rich Burn, Internal Combustion Engine In Refrigeration Service, Maximum Rated at 500HP, SN: 73BI453, Natural Gas Fired. (1989)	Uncontrolled	89LO295-1
E167	003	E167	Waukesha 1197GU, 4 Cycle Rich Burn, Internal Combustion Engine, Maximum Rated at 126 HP, SN: 158559, Natural Gas Fired. (1989)	Uncontrolled	89LO295-2
D001	006	V001	Enertek REB3983, Ethylene Glycol Dehydrator, Equipped with a Reboiler, Design Rate 300,000 Btu/hr, SN: 43482 (1995)	Uncontrolled	91LO133
F001	004	F001	Fugitive Emissions of VOCs from Equipment Leaks	Uncontrolled	89LO295-5

6. Compliance Assurance Monitoring (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV: **None**

7. Maximum Achievable Control Technology (MACT)

Based on the information provided by the applicant, this facility is not subject to the provisions of the MACT Standard for Natural Gas Transmission and Storage, 40 CFR Part 63, Subpart HHH Transmission and Storage Facilities or 40 CFR Part 63, Subpart HH Production.

SECTION II - Specific Permit Terms

1. E166 - Caterpillar G398TASI, 4 Cycle Rich Burn, ICE (500HP)

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
NOx	1.1 1.2	54.2 tons/yr	3.4 lb/MMBtu	Record keeping and Calculation ---------- Portable Monitoring	Monthly ---------- Quarterly when operating hours are 100 hours or more
CO		6.7 tons/yr	0.43 lb/MMBtu		
VOC		2.2 tons/yr	0.14 lb/MMBtu		
Fuel Use	1.3	31.9 MMscf/yr	Fuel Meter	Record keeping	Monthly
Btu Content	14			Record keeping and Calculations	Semi-Annually
Opacity	1.5	Not to exceed 20%		Record keeping	Annually

E167 - Waukesha 1197GU, 4 Cycle Rich Burn, ICE (126 HP)

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
NOx	1.1 1.2	18.02 tons/yr	3.4 lb/MMBtu	Record keeping and Calculations ---------- Portable Monitoring	Monthly ---------- Quarterly when operating hours are 100 hours or more
CO		2.28 tons/yr	0.43 lb/MMBtu		
VOC		0.74 tons/yr	0.14 lb/MMBtu		
Fuel Use	1.3	11.7 MMscf/yr	Fuel Meter	Record keeping	Monthly
Btu Content	1.4			Record keeping and Calculations	Semi-Annually
Opacity	1.5	Not to exceed 20%		Record keeping	Annually

1.1 Except as provided below, the emission factors listed above have been approved by the Division and shall be used to calculate emissions from these engines as follows.

Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor, the monthly fuel consumption and the lower heating value of the fuel in the equation below:

Lbs/mo = EF (lbs/MMBtu) x fuel use (MMSCF/mo) x lower heating value of fuel (MMBtu/MMSCF)

Monthly emissions from each engine shall be summed together and a twelve month rolling total of emissions will be maintained to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

If a reference method test is conducted under the provisions of Condition 1.2 immediately below, and the results of the testing show emissions of any pollutant to be above the emission factor(s) listed above, the emission factor determined during that test and approved by the Division shall be used in the above equation starting with the month that the test was performed and for all subsequent calculations. In addition, the permittee shall re-calculate all twelve month rolling total, annual, or short-term emissions (whichever apply) using the emission rates determined by the tests since the last Division-approved EPA Reference Tests. In the absence of credible evidence to the contrary, the engine(s) will be considered to be out of compliance for any periods that the re-calculated emissions are greater than either the NO_X or CO emission limitations.

In addition, the permittee shall apply for a modification to this permit to reflect the higher emission factor within 30 days of Division approval of the new emission factor.

If the results of the reference method testing conducted under the provisions of Condition 1.2 immediately below, are below the emission factor(s) listed above, emissions may be calculated using the new (lower) emission factor provided that subsequent testing as required by Condition 1.2 immediately below demonstrates compliance with this new factor. If the source chooses to use the new lower emission factor, the permittee shall apply for a modification to this permit to reflect the lower emission factor within 30 days of Division approval of the new emission factor.

1.2 Portable Monitoring (Ver 8-26-02)

Emission measurements of nitrogen oxides (NO_X) and carbon monoxide (CO) shall be conducted quarterly using a portable flue gas analyzer. At least one calendar month shall separate subsequent quarterly tests**.** Note that if the engine is operated for less than 100 hrs in any quarterly period, then the portable monitoring requirements do not apply.

A portable monitor testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to the initial test. The protocol shall include examples of all calculations to be used to determine the emission rates and factors set forth below. Written approval of the protocol must be received prior to any testing. Prior Division-approved protocols for either the facility or the owner/operator may be used without additional review. For the initial test, calibration of the analyzer shall be conducted according to manufacturer's instructions.

Results of the portable flue gas analyzer tests shall be used to monitor the compliance status of each engine. For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies. For comparison with the emission rate/factor shown in Table 1 above, the results of the tests shall be converted to the same units as the emission rate/factor.

An exceedance of either the NO_X or CO emission limitation or either the NO_X or CO emission rates/factors shown in Table 1 above during the initial portable flue gas analyzer test shall require a subsequent portable analyzer test indicating compliance with both the NO_X and CO emission limitations as well as verifying that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit within 14 operating days of the initial test. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

Note that if the unit is operated for any period of time during a day, then that day counts as an operating day.

If the portable flue gas analyzer results indicate compliance with both the NO_X and CO emission limitations and verifies both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit within the 14 day period, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_X and CO emission limitations for the relevant time period.

If the portable flue gas analyzer results fail to indicate compliance with either the NO_X or CO emission limitations or fail to verify that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. Results of all such testing and the associated calculations shall be submitted to the Division within 10 calendar days of the end of the 14 day period. The source will be required to conduct EPA Reference Test Methods (identified as Reference Method 7E and Reference Method 10 (40C.F.R. Part 60 Appendix A), hereinafter "EPA Reference Test Methods") or other test methods or procedures acceptable to the Division within 45 calendar days of the end of the 14 day period allowed for the portable flue gas analyzer testing**.** A compliance testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to the test. The protocol shall include examples of all calculations to be used to determine the emission rates set forth below. Written approval of the protocol must be received prior to any testing.

The Division shall be notified at least 30 calendar days prior to the EPA Reference Test date, so that it may choose whether to observe the testing. Results of all Reference Method tests and the associated calculations required below shall be submitted to the Division within 30 calendar days of the test.

For comparison with an annual or short term emission limit, the results of the EPA Reference Tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies. For comparison with the emission rates/factors shown in Table 1 above, the emission rates determined by the tests and approved by the Division shall be converted to the same units as the emission rates/factors in the permit. If the EPA Reference Test results indicate compliance with both the NO_X and CO emission limitations and verify that

both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_X and CO emission limitations for the relevant time period.

If the EPA Reference Tests fail to demonstrate compliance with either the NO_X or CO emission limitations and in the absence of credible evidence to the contrary, the engine will be considered to be out of compliance from the date of the initial portable flue gas analyzer test until the engine is taken off line.

If the EPA Reference Tests fail to verify that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit, the source shall re-calculate all twelve month rolling total, annual, or short-term emissions (whichever apply) using the emission rates determined by the tests and approved by the Division since the last Division-approved EPA Reference Tests using the procedures set forth in Condition 1.1 immediately above. In the absence of credible evidence to the contrary, the engine will be considered to be out of compliance for any periods that the calculated emissions are greater than either the NO_X or CO emission limitations.

Results of all tests conducted shall be kept on site and made available to the Division upon request.

1.3 Samples of fuel gas shall be collected and analyzed to determine C_1 through C_{6+} composition. The lower heating value of the fuel shall be calculated semi-annually using the results of the analysis and published heats of combustion (on the basis that combustion occurs with products and reactants in the vapor state) in terms of Btu/scf at 60 °F and 14.696 psia in the following equation:

$$\text{LHV Btu/scf} = \frac{\sum_i (C_i \text{ mol \%})(Hc_i \text{ Btu/scf})}{100}$$

where:

C_i = Concentration of Component i mol %

Hc_i = Heat of Combustion (vapor state of reactants) in Btu/scf at 60 °F & 14.696 psia

Calculation of monthly emissions for each engine required under Condition 1.1 shall be made using the calculated lower heating value based on the most recent required analysis in Condition 2.2.

1.4 Opacity of emissions from these engines shall not exceed 20% (Colorado Regulation No. 1, Section A.II.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for the engine.

1.5 These engines shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations, industry standard practices, and good engineering practices at all times, including periods of start-up, shutdown,

and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

2. D001 - Enertek REB3983 Ethylene Glycol Dehydrator

Parameter	Permit Condition Number	Limitation	Emission Factor	Monitoring	
				Method	Interval
VOC	2.1	9.41 tons/yr	Based on Input to GLYCalc Version (2.0 or higher) Model	Parametric	Daily
Extended Gas Analysis	2.2	NA	NA	EPA Reference Methods	Quarterly (To Annually)
Natural Gas Processed	2.3	1,825 MMscf/yr	NA	Flow Meter	Monthly

2.1 Total VOC emissions from the ethylene glycol dehydrator at this site shall not exceed the limitations stated above (Colorado Construction Permit 91LO133). The methods for determining compliance with these limits are as follows:

2.1.1 The ethylene glycol dehydration unit shall be considered operating in compliance with the emission limits if all of the listed parameters meet the comparison criteria stipulated below:

Parameter	Value	Units	Criteria
Cold Separator Temperature	65	degrees Fahrenheit	Below
Cold Separator Pressure	725	pounds per square inch	Below
Glycol Circulation Rate	1.5	gallons per minute	Below
Benzene Content of Gas	80	parts per million	Below
Toluene Content of Gas	115	parts per million	Below
Ethyl Benzene Content of Gas	30	parts per million	Below
Xylene Content of Gas	40	parts per million	Below

2.1.2 The cold separator temperature and pressure shall be measured and recorded daily. An average value for the calendar month for each of the parameters (cold separator temperature and pressure) shall be calculated if any daily value during the month fails to meet the comparison criteria stipulated in the table in Condition 2.1.1. If the calculated monthly averages meet the comparison criteria in the table in Condition 2.1.1, the unit shall be considered in compliance with the annual limit. If either the average cold separator temperature or pressure do not meet the stipulated comparison criteria, the GRI GLYCalc (Version 4.0 or higher) model shall be run to determine monthly emission rates. If required, the average monthly value calculation(s) and the GLYCalc model runs shall be completed by the 10th day of the subsequent month. Input to the model shall be the recorded average values for cold separator temperature, and glycol circulation rate, gas data from the most recent required analysis (see below), and the following assumed value of 746.7 psig for inlet gas pressure.

The circumstances surrounding any day on which the cold separator temperature and pressure values fail to be measured and recorded shall be described in a log to be maintained on-site. Data from the last day for which data exists will be substituted for the missing values for purposes of calculating the monthly average. No data substitution is necessary for days on which the unit did not operate.

2.1.3 If a GLYCalc run is required for any reason for a given month, the tons per year of emissions predicted by the model shall be compared to the annual VOC limit. A rolling 12-month total for VOC emissions shall be maintained to determine compliance with the annual limit. The 12-month total shall be assumed to be equal to the annual limit for any 12-month period for which no GLYCalc runs were triggered and for any period for which a GLYCalc run was triggered but the results of the run predict compliance with the annual VOC limit. If the source chooses, the 12-month rolling total may be based on actual emissions, provided GLYCalc was run, using the average daily parameters as required by Condition 2.1.1, for each month. Records of actual annual emission calculations shall be maintained and made available to the Division upon request. The calculation of the 12-month total shall be performed for any month a GLYCalc run is triggered if the results of the run fail to predict compliance with the annual VOC limit. If the 12-month total exceeds the annual limit, emissions for the previous months must be calculated with GLYCalc using the parameters described above until the rolling 12-month total is in compliance with the annual limitation.

2.2 Samples of inlet gas shall be collected and analyzed (extended gas analysis) to determine C_1 to C_6, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition annually. A GLYCalc model run will be conducted using the previous months data if any of the concentrations for BTEX listed in the table above are exceeded. The gas sampling frequency will revert to semi-annually if any of the BTEX constituents exceed the listed values during subsequent analyses. The sampling frequency will then remain as semi-annual until analyses indicates no exceedences for two consecutive tests, at which time the required frequency will return to annual.

2.3 The total cubic feet of gas processed by the ethylene glycol dehydrator shall not exceed the limitations listed above (Colorado Construction Permit 91LO133). The gas throughput to the dehydration units shall be recorded monthly using existing flow meters. A twelve month rolling total will be maintained to monitor compliance with annual limitations.

2.4 This unit shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations, industry standard practices and good engineering practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

3. F001 - Fugitive Emissions of VOCs from Equipment Leaks

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
VOC	3.1	93.0 tons/yr	By Component Type-EPA Protocol for Equipment Leak Estimates	Record keeping	Annually
General Provisions	3.2	N/A	N/A	Subject to NSPS General Provisions	
Leak Detection and Repair	3.3	N/A	N/A	Subject to NSPS KKK	

3.1 VOC emissions from equipment leaks shall not exceed the limitations stated above (Colorado Construction Permit 89LO295-5). Emissions shall be calculated using the emission factors and equations listed below:

Emission Factors for individual types of components in lbs/component-hr (Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017).

Connectors	0.00044
Flanges	0.000858
Open-ended Line	0.0044
*Other	0.01936
Pump	0.00528
Valve	0.0099

* This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps or valves.

Emissions of VOC per component =

No. Of Components x EF (lbs/component-hr) x 8760 hrs/yr x VOC content of gas

3.1.1 The most recent gas analysis as required under Section I, Condition 2.2. of this Operating Permit shall be used to determine the appropriate VOC content to use in the above equation.

3.1.2 A component count shall be conducted within 90 days of the issuance of this permit and every five (5) years thereafter to verify existing components and inventory.

3.1.3 A running total shall be kept of all additions and subtractions to the component count. The most recent count shall be used for emission calculations and compliance purposes.

3.2 Colorado Regulation No. 6, Part A, Subpart A, General Provisions applies as follows:

3.2.1 No article, machine, equipment or process shall be used to conceal an emissions which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (§61.12)

3.2.2 Records of startups, shutdowns, and malfunctions shall be maintained, as required under §60.7.

3.3 This source, except for the Enertek ethylene glycol dehydrator, is subject to 40 CFR Part 60.630, Subpart KKK, New Source Performance Standards (as adopted by reference in Colorado Regulation 6): Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The following items apply:

3.3.1 Inspection and maintenance requirements as stated in federal NSPS 40 CFR §60.632, §60.633, and §60.634.

3.3.2 Record keeping requirements as stated in federal NSPS 40 CFR §60.635.

3.3.3 Reporting requirements as stated in federal NSPS 40 CFR §60.636. Reporting under this section is to be fulfilled concurrently with Appendix B compliance monitoring reporting and shall be submitted to the Division.

3.3.4 The source shall follow the report submitted to the Division detailing the specific applicable and non-applicable sections of NSPS KKK.

SECTION III - Permit Shield

Colorado Regulation No. 3, 5 CCR 1001-5, Part A, §I.B.44; Part C, §§V.C.1.b. & V.D., XIII.B; §§25-7-111(2)(I), 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based upon the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

Emission Unit Description & Number	Applicable Requirement	Justification
D001 – Enertek REB3983 Ethylene Glycol Dehydrator	40 CFR Part 60, Subpart KKK – Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants and Colorado Regulation No. 6, Part A, Subpart A, General Provisions	The glycol dehydrator was constructed prior to the Subpart KKK January 20, 1984, applicability date. The relocation to the present site did not constitute a modification per 40 CFR § 60.14(e)(6). Colorado Regulation No. 6 Part A, Subpart A General Provisions do not apply when Subpart KKK does not apply.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.

2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Streamlined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

Permit Condition	Streamlined (Subsumed) Requirements
NONE	

SECTION IV - General Permit Conditions (Ver 01/07/03)

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.36.a. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.&e. and V.C.17.

a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless the Division in the Operating Permit specifies in the applicable requirement or a more frequent period.

c. Compliance certifications shall contain:

(i) the identification of each permit term and condition that is the basis of the certification;

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

(iv) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.

d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II,.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

(i) The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

(ii) Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

A. specifies or approves, in specific cases, the use of a test method with minor changes in methodology;

B. approves the use of an equivalent method;

C. approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or

D. waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7 1973, and pursuant to regulations promulgated by the Commission.

(iii) Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

(iv) The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

(v) The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

A. Sampling ports adequate for test methods applicable to such facility,

B. Safe sampling platform(s),

C. Safe access to sampling platform(s).

D. Utilities for sampling and testing equipment.

(vi) Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard the arithmetic mean of results of at least three runs shall apply. In the event that

a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two (2) other runs.

(vii) Criteria shall be established by the Division for the implementation of the requirements specified by Section II.D. of the Common Provisions Regulations.

(viii) Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Upset Conditions and Breakdowns

Upset conditions, as defined, shall not be deemed to be in violation of the Colorado regulations, provided that the Division is notified as soon as possible, but no later than two (2) hours after the start of the next working day, followed by a written notice to the Division explaining the cause of the occurrence and that proper action has been or is being taken to correct the conditions causing the violation and to prevent such excess emission in the future.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

(i) An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

A. The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;

B. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;

C. If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

D. The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;

E. All possible steps were taken to minimize the impact of excess emissions on ambient air quality;

F. All emissions monitoring systems were kept in operation (if at all possible);

G. The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

H. At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

(ii) The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

(iii) The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

(iv) The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards (NSPS) or national emissions standards for hazardous air pollutants (NESHAPS), any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

(v) Affirmative Defense Determination: In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3 and 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d., § 25-7-122.1(2), C.R.S.

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit

renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.

d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.

f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. the permitted facility was at the time being properly operated;

c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or upset provision contained in any applicable requirement.

6. Emission Standards for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "emission standards for asbestos."

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. Fee Payment

C.R.S §§ 25-7-114.1(6) and 25-7-114.7

a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;

b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;

d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit . The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.

b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Unless required by a permit term or condition to report deviations on a more frequent basis, "prompt" reporting shall entail submission of reports of deviations from permit requirements every six (6) months in accordance with paragraph 21.d. below. "Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:

(i) date, place as defined in the Operating Permit, and time of sampling or measurements;

(ii) date(s) on which analyses were performed;

(iii) the company or entity that performed the analysis;

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

(vi) the operating conditions at the time of sampling or measurement.

b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the enhanced monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that

inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.

c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.

d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.

b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of

permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

a. For sources located in an ozone non-attainment area or the Denver Metro Attainment Maintenance Area, all storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

   Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

END OF PERMIT REQUIREMENTS

OPERATING PERMIT APPENDICES

A - INSPECTION INFORMATION
B - COMPLIANCE MONITORING REPORT FORMAT
C - COMPLIANCE CERTIFICATION REPORT FORMAT
D - NOTIFICATION ADDRESSES
E - PERMIT ACRONYMS
F - PERMIT MODIFICATIONS
G - NSPS KKK EXAMPLE REPORT FORMAT

***DISCLAIMER:**
None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise stated in this permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

Directions to Plant:

The Yenter Natural Gas Plant is adjacent to the Yenter Compressor Station which is located on the west side of County Road 21, approximately 9 miles northwest of Sterling, Colorado. To access the Yenter Gas Plant, take Highway 14 west from Sterling for approximately 7 miles. Turn north on County Road 25. Take County Road 25 north, approximately 4 miles. Turn west on County Road 38. Take County Road 38 west, approximately 1 mile. Turn south on County Road 21. The facility is on the east side of County Road 21, approximately 1/4 mile from the turnoff.

Safety Equipment Required:

Eye Protection, Hard Hat, Hearing Protection, Eye Protection and Flame Resistant Clothing

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on December 18, 1995, with the source's Title V Operating Permit Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

Cummings diesel back-up generator
Refrigerant compressor blowdown
8" Springdale pig receiver
Two (2) natural gas ESD (emergency relief valve)
Propane gas ESD (emergency relief valve)
Sludge tank vent
Office heater, 50,000 Btu/hr
Two (2) portable heaters, 5,000 Btu/hr and 10,000 Btu/hr
Portable generator, 8 HP
Portable air compressor, 10 HP
Portable pressure washer, 18 HP
Acetylene torch
Ethylene glycol storage tank, <500 gal
Methanol storage tank, <500 gal
Used engine oil tank
Diesel storage tank
25 liquid storage tanks for sales (propane, BG and NGL)

APPENDIX B
Monitoring and Permit Deviation Reporting

with codes ver 2/1/01

Reporting Requirements and Definitions

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

(A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);

(B) fails to notify or report as required under the Act; or

(C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the record keeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to upset conditions and malfunctions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "upset" shall refer to both emergency conditions and upsets. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due every six months unless otherwise noted in the permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

(1) A situation where emissions exceed an emission limitation or standard contained in the permit;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;

(3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is record keeping
7 = Report:	When the requirement is reporting

8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each permit term and condition during the certification period and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.[1]
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

[1] For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event. Further, periods of excess emissions during startup, shutdown and malfunction may not be found to be a violation of an emission limitation or standard where the source adequately shows that any potential deviations as a result of these infrequent periods were minimized to the extent practicable and could not have been prevented through careful planning, design, or were unavoidable to prevent loss of life, personal injury, or severe property damage.

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

Understanding the application of Startup, Shutdown, Malfunctions, Emergency provisions, and the Upset provisions is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergencies and Upsets

Under the Emergency provisions of Part 70 and the Upset provisions of the State regulations, certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Upset means an unpredictable failure of air pollution control or process equipment which results in the violation of emission control regulations and which is not due to poor maintenance, improper or careless operations, or is otherwise preventable through exercise of reasonable care.

Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division on a semi-annual basis unless otherwise noted in the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Sterling Energy Company – Yenter Gas Processing Plant
OPERATING PERMIT NO: 95OPLO105
REPORTING PERIOD: _____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
E166	Caterpillar G398TASI, 4 Cycle Rich Burn, Internal Combustion Engine In Refrigeration Service, Maximum Rated at 500HP, SN: 73BI453, Natural Gas Fired. (1989)					
E167	Waukesha 1197GU, 4 Cycle Rich Burn, Internal Combustion Engine, Maximum Rated at 126 HP, SN: 158559, Natural Gas Fired. (1989)					
D001	Enertek REB3983, Ethylene Glycol Dehydrator, Equipped with a Reboiler, Design Rate 300,000 Btu/hr, SN: 43482 (1995)					
F001	Fugitive Emissions of VOCs from Equipment Leaks					
General Conditions						
Insignificant Activities						

[1] See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

[2] Use the following entries, as appropriate

1 = Standard: When the requirement is an emission limit or standard
2 = Process: When the requirement is a production/process limit
3 = Monitor: When the requirement is monitoring
4 = Test: When the requirement is testing
5 = Maintenance: When required maintenance is not performed

6 = Record:	When the requirement is record keeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: [Company Name] - [Facility Name]
OPERATING PERMIT NO: [Permit #]
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Upset _____ N/A _____

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____
Malfunction _____ Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Upsets/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/96 - 6/30/96

Is the deviation being claimed as an: Emergency _____ Upset _XX_ N/A _____

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____
Malfunction _____ Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/96
END- 1800 4/10/96

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Upsets/Emergencies Reported (if applicable)

4/10/96 to S. Busch, APCD

Deviation Code _____ Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Sterling Energy Company – Yenter Gas Processing Plant

FACILITY IDENTIFICATION NUMBER: 0750029

PERMIT NUMBER: 95OPLO105

REPORTING PERIOD _____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.54. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

_____

Printed or Typed Name Title

_____

Signature of Responsible Official Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

APPENDIX C
Required Format for Annual Compliance Certification Reports

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Sterling Energy Company – Yenter Gas Processing Plant
OPERATING PERMIT NO: 95OPLO105
REPORTING PERIOD: _____

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	Yes	No	Continuous	Intermittent	Yes	No
E166	Caterpillar G398TASI, 4 Cycle Rich Burn, Internal Combustion Engine In Refrigeration Service, Maximum Rated at 500HP, SN: 73BI453, Natural Gas Fired. (1989)								
E167	Waukesha 1197GU, 4 Cycle Rich Burn, Internal Combustion Engine, Maximum Rated at 126 HP, SN: 158559, Natural Gas Fired. (1989)								
D001	Enertek REB3983, Ethylene Glycol Dehydrator, Equipped with a Reboiler, Design Rate 300,000 Btu/hr, SN: 43482 (1995)								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	Yes	No	Continuous	Intermittent	Yes	No
F001	Fugitive Emissions of VOCs from Equipment Leaks								
General Conditions[5]									
Insignificant Activities [5]									

[1] If deviations were noted in the previous deviation report (i.e. for the first six months of the annual reporting period), put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

[2] Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

[3] Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and record keeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and record keeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

[4] Note whether the method(s) used to determine the compliance status with each term and condition provided continuous or intermittent data.

[5] Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)

B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in §18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of §25-7 122.1, C.R.S.

_____

Printed or Typed Name Title

_____

Signature Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D
Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Jim King

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 300
Denver, CO 80202

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 300
Denver, CO 80202

APPENDIX E
Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/MMBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration

PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F
Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION